

Gregory N. Karasik SBN 115834
greg@spiromoss.com
Spiro Moss LLP
11377 W. Olympic Blvd., Fifth Floor
Los Angeles, CA 90064
Telephone: (310) 235-2468
Facsimile (310) 235-2456

Attorneys for Plaintiff
MICHAEL BATEMAN

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

MICHAEL BATEMAN, individually
and on behalf of all others similarly
situated,

Plaintiffs

v.

AMERICAN MULTI-CINEMA, INC.;
and DOES 1-10,

Defendants.

Case No. CV 07-00171 JHN-AJWx

CLASS ACTION

**NOTICE OF MOTION AND
MOTION FOR AWARD OF
ATTORNEY'S FEES, COSTS AND
ENHANCEMENT PAYMENT**

Date: August 1, 2011

Time: 10:00 a.m.

Ctrm: 790 (Roybal)

Please take notice that, on August 1, 2011, at 10:00 a.m. or as soon thereafter as counsel may be heard, in Courtroom 790 in the Roybal Federal Building and Courthouse, located at 255 E. Temple Street, Los Angeles, California, plaintiff Michael Bateman ("Plaintiff") will and hereby does move for an award of attorney's fees, costs and an enhancement payment in connection with final approval of the class action settlement (the "Settlement") reached between Plaintiff and defendant American Multi-Cinema, Inc. ("AMC") that was preliminary approved by the Court on March 22, 2011. Specifically, Plaintiff moves for an order:

1. Awarding Plaintiff's counsel attorney's fees in the amount of \$1,380,000;
2. Awarding Plaintiff's counsel costs in the amount of \$19,675.50 and
3. Awarding Plaintiff an enhancement payment in the amount of \$7,500.

Plaintiff's motion is made on the grounds that the provisions in the Settlement authorizing awards of attorney's fees and costs to Plaintiff and an enhancement payment to Plaintiff are fair and reasonable under Rule 23(e) of the Federal Rules of Civil Procedure and the amount of fees and costs requested by Plaintiff's counsel are reasonable under Rule 23(h) of the Federal Rules of Civil Procedure. Plaintiff's motion is based on this Notice; the Memorandum of Points and Authorities and Declaration of Gregory N. Karasik submitted herewith; all other pleadings and papers on file in this action; and any oral argument or other matter that may be considered by the Court.

Dated: June 27, 2011

SPIRO MOSS LLP

By: /s/ Gregory N. Karasik
Gregory N. Karasik

Attorneys for Plaintiff